Beverly Cahill Rice State Bar No. 24031785 Beasley, Hightower & Hartmann, P.C. 1700 Pacific Avenue, Suite 4450 Dallas, Texas 75201 (214) 220-4700 (telephone) (214) 220-4753 (facsimile)

ATTORNEY FOR TYGRIS VENDOR FINANCE, INC.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

\$ Case No. 08-36705-BJH-11

SUPERIOR AIR PARTS, INC.

\$ Hearing Date: 12/23/09

DEBTOR-IN-POSSESSION.

\$ Hearing Time: 9:00 a.m.

RESPONSE TO DEBTOR'S OBJECTION TO CLAIM NO. 189 FILED BY TYGRIS VENDOR FINANCE, INC. F/K/A US EXPRESS LEASING

TO THE HONORABLE BARBARA J. HOUSER, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Tygris Vendor Finance, Inc. f/k/a US Express Leasing ("Tygris") and files this, its Response to Debtor's Objection to Claim No. 189 Filed By Tygris Vendor Finance, Inc. f/k/a US Express Leasing ("Response") and respectfully shows the Court as follows:

- 1. Tygris admits the allegations contained within Paragraph 1 of the Objection to Claim No. 189 Filed By Tygris Vendor Finance, Inc. f/k/a US Express Leasing ("Objection").
- 2. Tygris admits the allegations contained within Paragraph 2 of the Objection.
- 3. Tygris admits the allegations contained within Paragraph 3 of the Objection. However, Tygris contends that it received the initial notice of an April 29, 2009 proof of claim bar date. Notice of the Court's Order Setting Bar Date for Claims was sent to a company lockbox in Colorado and was not received by the New Jersey home office handling this account until the February 17th Bar Date had passed.
- 4. Tygris admits the allegations contained within Paragraph 4 of the Objection. However, Tygris contends that it received the initial notice of an April 29, 2009 proof of claim bar date.

Notice of the Court's Order Setting Bar Date for Claims was sent to a company lockbox and was not received by the New Jersey office handling this account until the February 17th Bar Date had passed.

- 5. Tygris admits the allegations contained within Paragraph 5 of the Objection.
- 6. Paragraph 6 contains statements to which no admission or denial by Tygris is necessary.

 The documents mentioned in Paragraph 6 speak for themselves.
- 7. Paragraph 7 contains statements to which no admission or denial by Tygris is necessary.

 The documents mentioned in Paragraph 6 speak for themselves.
- 8. Tygris denies the allegations contained within Paragraph 8 of the Objection.
- 9. Tygris denies the allegations contained within Paragraph 9 of the Objection.
- 10. Tygris denies the allegations contained within Paragraph 10 of the Objection.
- 11. Paragraph 11 contains statements to which no admission or denial by Tygris is necessary.
- 12. Tygris denies that Movant is entitled to any of the relief she seeks in the Prayer of the Objection or to any other relief. Tygris further denies all allegations of the Objection not expressly admitted above, including without limitation, all allegations set forth in unnumbered paragraphs and any allegations set forth in any exhibits or other attachments to the Objection.

DATED December 8, 2009.

Respectfully submitted,

BEASLEY, HIGHTOWER & HARTMANN, P.C. 1700 Pacific Avenue, Suite 4450 Dallas, TX 75201 (214) 220-4700 (telephone) (214) 220-4753 (telefax)

By: /s/Beverly Cahill Rice

Beverly Cahill Rice

State Bar Number 24031785

ATTORNEYS FOR RESPONDENT, TYGRIS VENDOR FINANCE, INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing was served upon the parties listed below by First Class Mail, postage prepaid, or by electronic filing notification, on December 8, 2009.

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/s/ Beverly Cahill Rice
Beverly Cahill Rice